

August 26, 2015

Mr. David Conroy, Air Branch Chief  
United States Environmental Protection Agency  
Region 1, EPA New England  
5 Post Office Square  
Suite 100  
Boston, Massachusetts 02109-3912

Re: 2014 Annual Evaluation of Connecticut's Inspection and Maintenance Program

Dear Mr. Conroy:

I am pleased to submit the enclosed *2014 Annual Evaluation of Connecticut's Inspection and Maintenance Program* (Report), which fulfills the Environmental Protection Agency's (EPA) requirements to provide an annual evaluations of a state's inspection and maintenance (I/M) program in accordance with 40 CFR 51.366.

EPA's comments on 2012-2013 Biennial Evaluation of Connecticut's Inspection and Maintenance Program and 2013 Annual Data, as outlined in the attached letter dated December 10, 2014, are addressed by:

- EPA's recommendation on more explicitly addressing the biennial reporting requirements of 40 CFR 51.366(e)(1) and(e)(2) will be addressed in the 2014-2015 Biennial Report. (Comment 1)
- Connecticut providing Ariel Garcia of EPA with a PDF of the data in Appendix B on December 19, 2014, to make it easier to sort through the data. (Comment 2)
- Connecticut looks forward to EPA's leadership in developing partnerships with the other jurisdictions to improve the program by addressing the number of vehicles with no final outcome. (Comment 3)

This Report compares and contrasts the testing results of the most recent year of testing, outlines the programmatic changes made during the past year, and includes the EPA requested information on diesel testing, although this last element is not a federal requirement.

This Report analyzes data collected from January 1, 2014 to December 31, 2014. This Report is composed of an evaluation of the 2014 data; Appendix A, containing the EPA provided checklist for the annual and biennial reports, identifying the data elements required to be included in this evaluation; and Appendix B, containing the 2014 data, compiled in and corresponding to the indexing system used in EPA's checklist.

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Along with this Report, I have enclosed the Connecticut Department of Motor Vehicles' *2014 On-Road Vehicle Survey*, to fulfil EPA's requirement to conduct independent on-road emission testing once every inspection cycle, in accordance with 40 CFR 51.371(a)(3).

The I/M program, which dates back to 1983, is an important part of Connecticut's clean air strategy and has a long history of effectively reducing vehicle emissions. The I/M program results in more emission reductions than any other emissions reduction strategy. Modeled estimates indicate that in 2010, this program provided approximately 19 of the 200 tons per day of air pollutant reductions included in Connecticut's Attainment Demonstration for the 1997 Ozone National Ambient Air Quality Standard. Continued demonstration that this program maintains such significant and justifiable programmatic emission reductions in MOVES is critical as Connecticut evaluates further strategies ozone control options for a cost effective program for the future.

The Department of Motor Vehicles partnered with the Department of Energy and Environmental Protection in developing this report, and provided valuable review of its content. If you have any questions or comments regarding this Report or if the Department may be of any assistance in this matter, please contact Dr. Ellen Pierce at 860- 424-3012.

Yours truly,



Anne Gobin  
Bureau Chief